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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

HUMAN RIGHTS WATCH,

Plaintiff,

v.

DEPARTMENT OF JUSTICE FEDERAL
BUREAU OF PRISONS,

Defendant.

13 Civ. 7360 (JPO)

NOTICE OF MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that upon the Memorandum of Law in Support of Defendant's Motion for Summary Judgment; the Declaration of Elizabeth Tulis; the Public Declaration of Clinton Stroble with exhibits annexed thereto; the *Ex Parte*, Under Seal Declaration of Clinton Stroble; the Declaration of Gail A. Brodfuehrer with exhibit annexed thereto; the Declaration of Vanessa R. Brinkmann with exhibits annexed thereto; and all prior pleadings and proceedings herein, defendant Department of Justice Federal Bureau of Prisons ("Defendant"), by its attorney, Preet Bharara, United States Attorney for the Southern District of New York, hereby

moves this Court for an order granting Defendant summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure, and for such other and further relief as the Court deems proper.

Pursuant to the Court's order of January 8, 2015, Plaintiff's opposition to Defendant's motion for summary judgment is due on March 25, 2015.

Dated: New York, New York
February 23, 2015

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